

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:	X	
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THE FINANCIAL OVERSIGHT AND	:	PROMESA
MANAGEMENT BOARD FOR PUERTO RICO,	:	Title III
	:	
as representative of	:	Case No. 17-BK-3283 (LTS)
	:	
THE COMMONWEALTH OF PUERTO RICO <i>et al.</i> ,	:	(Jointly Administered)
	:	
Debtors. ¹	:	

In re:	X	
	:	
	:	
THE FINANCIAL OVERSIGHT AND	:	PROMESA
MANAGEMENT BOARD FOR PUERTO RICO,	:	Title III
	:	
as representative of	:	Case No. 17-BK-3566 (LTS)
	:	
THE EMPLOYEES RETIREMENT SYSTEM OF THE	:	(Jointly Administered)
GOVERNMENT OF THE COMMONWEALTH OF	:	
PUERTO RICO,	:	
	:	
Debtor.	:	

**JOINT INFORMATIVE MOTION OF OFFICIAL COMMITTEE OF UNSECURED
CREDITORS AND FINANCIAL OVERSIGHT AND MANAGEMENT BOARD,
ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE, REGARDING OMNIBUS
MOTION TO EXTEND TIME FOR SERVICE OF SUMMONSES AND COMPLAINTS
AND TO STAY CERTAIN ADVERSARY PROCEEDINGS RELATING TO CERTAIN
ERS BONDS [DKT. NO. 523 IN CASE NO. 17-3566 (LTS)]**

¹ The Debtors in these Title III cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474), and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747).

To the Honorable United States Magistrate Judge Judith Gail Dein:

The Official Committee of Unsecured Creditors of all Title III Debtors (other than COFINA) (the “Committee”) and the Special Claims Committee of the Financial Oversight and Management Board for Puerto Rico, acting by and through its members (the “Oversight Board,” and together with the Committee, “Movants”) hereby submits this informative motion (the “Informative Motion”) and respectfully state as follows:

1. On May 21, 2019, Movants moved to stay certain ERS-related adversary proceedings asserting claims for declaratory relief and to recover certain principal and interest payments made in connection with certain bonds issued by the Employees Retirement System of the Government of the Commonwealth of Puerto Rico. *See Omnibus Motion by Official Committee of Unsecured Creditors, Financial Oversight and Management Board, Acting Through its Special Claims Committee, to Extend Time for Service of Summonses and Complaints and to Stay Certain Adversary Proceedings Relating to Certain ERS Bonds* [Docket No. 523 in Case No. 17-BK-3566 (LTS)] (the “Stay Motion”). The Stay Motion identified six such adversary proceedings: Adv. Proc. Nos. 19-356, 19-357, 19-358, 19-359, 19-360, and 19-361 (collectively, the “ERS Adversary Proceedings”).

2. On June 13, 2019, the Court granted, with certain modifications, the Motion with respect to the ERS Adversary Proceedings. *See Order Regarding Omnibus Motion by Official Committee of Unsecured Creditors, Financial Oversight and Management Board, and its Special Claims Committee to Extend Time for Service of Summonses and Complaints and to Stay Certain Adversary Proceedings Relating to Certain ERS Bonds* [Docket No. 556 in Case No. 17-BK-3566 (LTS)] (the “Original Order”). The Original Order was entered in the ERS case and in each of the six ERS Adversary Proceedings.

3. After entry of the Stay Order, Movants discovered that a seventh adversary proceeding had been inadvertently omitted from the Motion: Adv. Proc. No. 19-355 (the “Additional ERS Adversary Proceeding”). The Additional ERS Adversary Proceeding is identical to the ERS Adversary Proceedings identified in the Motion, except that it involves a different set of defendants.

4. As permitted by the Court at the end of the June 28, 2019 hearing, Movants submit this Informative Motion to advise the Court of the inadvertent omission of the Additional ERS Adversary Proceeding and to request that the Court enter a supplemental order, in the form attached hereto as **Exhibit A** (the “Supplemental Order”) in the ERS case and in the Additional ERS Adversary Proceeding. The Supplemental Order provides the identical relief to that in the Original Order, except that it applies to the Additional ERS Adversary Proceeding.

5. For ease of reference, a blackline reflecting the changes between the Original Order and Supplemental Order is attached hereto as **Exhibit B**.

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WHEREFORE, Movants respectfully requests that the Court take notice of the above.

Dated: July 1, 2019

Respectfully submitted,

/s/ G. Alexander Bongartz

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